

# EXHIBIT 29

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7 PIZZA ASIA VENTURES, INC.

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10

11 SHAKEY'S PIZZA ASIA VENTURES,  
12 INC, a Philippines corporation,

13 Plaintiff,

14 v.

15 PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING,  
16 LLC, a Delaware limited liability  
company; GUY KOREN, an individual;  
17 POTATO CORNER LA GROUP, LLC,  
a California limited liability company;  
18 NKM CAPITAL GROUP, LLC, a  
California limited liability company; J &  
19 K AMERICANA, LLC, a California  
limited liability company; J&K  
20 LAKEWOOD, LLC, a California  
limited liability company; J&K  
21 VALLEY FAIR, LLC, a California  
limited liability company; J & K  
22 ONTARIO, LLC, a California limited  
liability company; HLK MILPITAS,  
23 LLC, a California, limited liability  
company; GK CERRITOS, LLC, a  
24 California, limited liability company;  
J&K PC TRUCKS, LLC, a California  
25 limited liability company; and, GK  
CAPITAL GROUP, LLC, a California  
26 limited liability company and DOES 1  
through 100, inclusive,

27 Defendants.  
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Case No. 2:24-CV-04546-SB(AGRx)

*Hon. Stanley Blumenfeld*

**JOINT STATUS REPORT OF  
PLAINTIFF AND DEFENDANTS  
REGARDING ONGOING MEET  
AND CONFER DISCUSSIONS**

Date: February 28, 2025

Time: 8:30 a.m.

Courtroom: 6C

Complaint Filed: May 31, 2024

Trial Date: August 4, 2025

1 PCJV USA, LLC, a Delaware limited  
2 liability company; PCI TRADING LLC,  
3 a Delaware limited liability company;  
4 POTATO CORNER LA GROUP LLC,  
5 a California limited liability company;  
6 GK CAPITAL GROUP, LLC, a  
California limited liability company;  
NKM CAPITAL GROUP LLC, a  
California limited liability company; and  
GUY KOREN, an individual,

7 Counter-Claimants,

8 v.

9 SHAKEY'S PIZZA ASIA VENTURES,  
10 INC, a Philippines corporation,

11 Counter Defendant.

12 PCJV USA, LLC, a Delaware limited  
13 liability company; PCI TRADING LLC,  
14 a Delaware limited liability company;  
15 POTATO CORNER LA GROUP LLC,  
16 a California limited liability company;  
17 GK CAPITAL GROUP, LLC, a  
California limited liability company;  
NKM CAPITAL GROUP LLC, a  
California limited liability company; and  
GUY KOREN, an individual,

18 Third Party Plaintiffs,

19 v.

20 PC INTERNATIONAL PTE LTD., a  
21 Singapore business entity; SPAVI  
22 INTERNATIONAL USA, INC., a  
23 California corporation; CINCO  
CORPORATION, a Philippines  
corporation; and DOES 1 through 10,  
inclusive,

24 Third Party Defendants.

**JOINT STATEMENT**

Pursuant to this Court's Order of March 4, 2025 (Dkt. 117), Plaintiff and Defendants PCJV USA, LLC and Guy Koren (collectively, "Defendants") submit the following status report, regarding their ongoing meet and confer efforts to resolve (1) "any outstanding violations of the Court's preliminary injunction," and (2) "the amount of reasonable attorney's fees to award to Plaintiff in connection with its contempt motion."

On Wednesday afternoon, March 5, 2025, counsel for Plaintiff, Michael Murphy, and counsel for Defendants, Arash Beral and Todd Malynn, met, in person, at the offices of Fox Rothschild to discuss both of the topics remaining to be resolved. Mr. Murphy presented to Defendants' counsel some pictures of outstanding violations that Plaintiff was prepared to submit on February 28, 2025, which he sent by email to Defendants' counsel the following day (Thursday, March 6, 2025). Mr. Beral indicated that he would address these with his clients so that they could address any remaining issues with the store entities. Defendants' counsel represented in the hours before this filing that these issues have been resolved, however, Plaintiff has not had an opportunity to evaluate, ask further questions regarding, or conduct its own due diligence as to these representations.

As to the reasonable fees question, at the in person meet and confer, Mr. Murphy raised certain categories of fees that he would consider as damages from contempt, inviting Defendants' counsel responded as to whether they agree or disagree. After that discussion, he informed Defendants' counsel that, based on that discussion, he would forward his fee invoices for Defendants' counsel's review.

On Saturday, March 8, Plaintiff's counsel sent an email itemizing the fees and costs that it maintains was caused by, or would not have been incurred but for, Defendants' noncompliance with the injunction. Plaintiff's counsel included backup in the form of invoices and then proposed as a means to resolve the dispute, a

1 reduction of 30% of the total fees Plaintiff alleges to have been incurred.  
2 Defendants' counsel was able to download the fee invoices on the date of this  
3 filing, and requested more time to review them, which Plaintiff agreed to grant.

4 Both Plaintiff and Defendants agree that an extension makes sense. It is the  
5 belief of the parties that they are moving in the right direction, and that it is likely  
6 that there will be resolution. The Parties respectfully request leave for additional  
7 time to thoroughly discuss these issues, and to file a further report on or by  
8 Wednesday, March 12, 2025.

9 Dated: March 10, 2025

**FOX ROTHSCHILD LLP**

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11  
12 Michael D. Murphy  
13 Jordan Zollicoffer  
14 Attorneys for Plaintiff SHAKEY'S  
15 PIZZA ASIA VENTURES, INC.

16 DATED: March 10, 2025

**BLANK ROME LLP**

17  
18  
19 By: /s/ Arash Beral

20 Arash Beral  
21 Todd Malynn  
22 Victor Sandoval  
23 Attorneys for Defendants

**CERTIFICATE OF SERVICE**

The undersigned certifies that, on February 27, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's ECF filing system. I further certify that all counsel for all parties to this action are registered CM/ECF user and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: February 27, 2025

**FOX ROTHSCHILD LLP**

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Michael D. Murphy  
Attorneys for Plaintiff SHAKEY'S  
PIZZA ASIA VENTURES, INC.

**From:** [Murphy, Michael D.](#)  
**To:** [Beral, Arash](#)  
**Cc:** [James, Pauletta](#); [Zollicoffer, Jordan](#); [Malynn, Todd M.](#)  
**Subject:** Resending not in redline, and cleaned up a bit. it is a good compromise  
**Date:** Monday, March 10, 2025 7:45:35 PM  
**Attachments:** [Joint Statement re Contempt Negotiations March 10 2025\(169351412.1\)-C-C-C-C.docx](#)

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